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Attorneys for Defendant,  
CALIFORNIA FORENSIC MEDICAL GROUP,  
LAURA RODRIGUEZ, ELIZABETH KAISER,  
JAMES LUDERS, M.D. and MICHAEL E. DAGEY, R.N.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and  
Personal Representative of THE ESTATE OF  
RYAN GEORGE; VALERIE GEORGE and  
TAJMAH BEAUCHAMP, as Legal  
Representatives for Jaida George and Ryan  
George, Jr.; VALERIE GEORGE, Individually;  
DONALD GEORGE; and TAJMAH  
BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S DEPARTMENT;  
BILL COGBILL; COUNTY OF SONOMA;  
CALIFORNIA FORENSIC MEDICAL GROUP, INC.;  
MICHAEL E. DAGEY, R.N.; ELIZABETH  
KAISER; JAMES LUDERS, M.D.; LAURA  
RODRIGUEZ; SUTTER HEALTH; SUTTER  
MEDICAL CENTER OF SANTA ROSA; and  
DOES 1 through 25, inclusive,

Defendants.

Civ. No. 3:08-cv-02675-EDL

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO FILE RESPONSIVE  
PLEADING AFTER PLAINTIFFS FILE  
AMENDED COMPLAINT AS MODIFIED**

SUBJECT TO THE APPROVAL OF THE COURT, IT IS HEREBY STIPULATED BY  
AND BETWEEN THE PARTIES HERETO, THROUGH THEIR RESPECTIVE COUNSEL OF  
RECORD:

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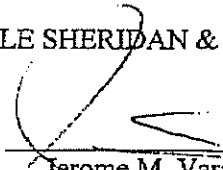
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1. Plaintiffs' Complaint was filed on May 28, 2008.
2. Service has been made on California Forensic Medical Group, Laura Rodriguez, Elizabeth Kaiser, James Luders, M.D. and Michael E. Dagey, R.N.
3. Counsel have met and conferred regarding the Complaint, and plaintiffs have agreed to file an Amended Complaint.
4. Responsive pleadings for defendants California Forensic Medical Group, Laura Rodriguez, Elizabeth Kaiser, James Luders, M.D. and Michael E. Dagey, R.N. will not be due until 20 days after plaintiffs file and serve an Amended Complaint.
5. All other case deadlines will be rescheduled following the service of the Amended Complaint.

**SO STIPULATED.**

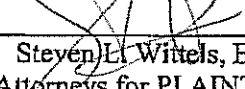
DATED: July 24, 2008

TRIMBLE SHERIDAN & VARANINI

By:   
Jerome M. Varanini, ESQ.  
Attorneys for Defendants California  
Forensic Medical Group, Laura  
Rodriguez, Elizabeth Kaiser, James  
Luders, M.D. and Michael E. Dagey,  
R.N

DATED: July 25, 2008

SANFORD WITTELS & HEISLER, LLP

By:   
Steven L. Wittels, ESQ.  
Attorneys for PLAINTIFFS

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DATED: July 24, 2008

LAW OFFICE OF TANYA BRANNAN

By: *Tanya Brannan*  
Tanya Brannan, ESQ.  
Attorneys for PLAINTIFFS

**PROPOSED ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

The amended complaint shall be filed no later than September 2, 2008. The Case Management Conference is continued to October 7, 2008 at 10:00. A joint Case Management Conference statement shall be filed no later than September 30, 2008.

DATED: \_\_\_\_\_, 2008

Dated: August 4, 2008

The Honorable ELIZABETH D. LAPORTE  
UNITED STATES MAGISTRATE JUDGE

